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12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14

15 In re
16 PG&E CORPORATION and
17 PACIFIC GAS AND ELECTRIC
COMPANY,

18 Debtors.

19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors
22 *All papers shall be filed in the Lead Case,
23 No. 19-30088 (DM)
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) Bankruptcy Case
) No. 19-30088 (DM)
) Chapter 11
) (Lead Case)
) (Jointly Administered)
)

) **JOINDER TO OMNIBUS OBJECTIONS**
) **OF THE OFFICIAL COMMITTEE OF**
) **TORT CLAIMANTS (SUBSTANTIVE)**
) **TO CLAIMS FILED BY THE**
) **DEPARTMENT OF HOMELAND**
) **SECURITY/FEDERAL EMERGENCY**
) **MANAGEMENT AGENCY (CLAIMS**
) **NOS. 59692, 59734 & 59783) AND TO**
) **CLAIMS FILED BY CALIFORNIA**
) **GOVERNOR'S OFFICE OF**
) **EMERGENCY SERVICES (CLAIM**
) **NOS. 87748, 87754, & 87755)**

) Date: February 26, 2020
) Time: 10:00 a.m. (Pacific Time)
) Place: United States Bankruptcy Court
) Courtroom 17, 16th Floor
) San Francisco, CA 94102
)

) Re: Docket Nos. 4943, 5096, 5319, 5320
)

1 TO THE COURT, ALL PARTIES, AND ALL ATTORNEYS OF RECORD
2 The Singleton Law Firm, APC (“SLF”), Marshack Hays, LLP, and their co-counsel represent
3 approximately 7,000 victims of the 2015 Butte Fire, the 2017 North Bay Fires, and the 2018 Camp
4 Fire (“SLF Fire Victim Claimants”).

5 Individual Butte Fire, North Bay Fires and Camp Fire Victim Claimants (the “**Fire**
6 **Victims**”), in the above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and
7 Electric Company, as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”)
8 hereby support and join the following objections filed by the Official Committee of Tort Claimants
9 (the “**TCC**”): (i) *Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to*
10 *Claims Filed by the Department of Homeland Security/Federal Emergency Management Agency*
11 *(Claim Nos. 59692, 59734 & 59783) [Dkt. No. 4943] (the “TCC FEMA Objection”); (ii)*
12 *Supplement To Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to*
13 *Claims Filed by the Department of Homeland Security/Federal Emergency Management Agency*
14 *(Claim Nos. 59692, 59734 & 59783) [Dkt. No. 5319] (the “TCC Supplemental FEMA*
15 *Objection”)* (iii) *Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to*
16 *Claims Filed by California Governor’s Office of Emergency Services (Claim Nos. 87748, 87754, &*
17 *87755) [Dkt. No. 5096] (the “TCC Cal OES Objection”); and (iv) Supplement to Omnibus*
18 *Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by California*
19 *Governor’s Office of Emergency Services (Claim Nos. 87748, 87754, & 87755) [Dkt. No. 5320]*
20 *(the “TCC Supplemental Cal OES Objection,”* and together with the TCC FEMA Objection, the
21 TCC Supplemental FEMA Objection, and the TCC Cal OES Objection, the “**Objections**”). The
22 SLF Fire Victim Claimants also hereby support and join in the additional arguments stated in the
23 Joinder of Fire Claimants in the TCC’s Objections to Claims by FEMA and Cal OES filed by
24 Thomas Tosdal, Esq., on behalf of his clients.

25 **JOINDER**

26 Pursuant to Section 502(b)(1) of the Bankruptcy Code, a claim is not allowed if the claim “is
27 unenforceable against the debtor . . . under any . . . applicable law.” 11 U.S.C. § 502(b)(1). The Fire
28 Victims support and join in all arguments asserted in the Objections.

1 The SLF Fire Victim Claimants reserve all rights to be heard before the Court in connection
2 with the Objections (and any joinders thereto), to amend, supplement, or otherwise modify this
3 Joinder prior to or during the preliminary hearing on the Objections, and to assert such other and
4 further objections prior to the final adjudication of the matter.

5 For the reasons set forth in the Objections, the SLF Fire Victim Claimants respectfully
6 request that the Court enter an order disallowing and expunging the FEMA Claims and the Cal OES
7 Claims identified in the Objections.

8 Dated: February 12, 2020

Respectfully submitted,

9 SINGLETON LAW FIRM, APC

10 By: 
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12 MARSHACK HAYS, LLP

13 Richard A. Marshack, Esq.

14 David A. Wood, Esq.

Laila Masud, Esq.

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